



Response Submitted Via Email to: Okpala.Maria@epa.gov

**NPDES Permit Application No. TX0074012, Bryan Mound SPR Oil Storage
Fecal Coliform Results**

Attached to this letter are the effluent data results for Fecal Coliform from the site's Sewer Treatment Plant (STP), Outfall 002. Three data sets were collected a week apart.

The Bryan Mound Fecal Results are as follows:

Date Collected: 8/21/2019
Time Collected: 7:15 am
Result: 260 cfu/100 mL

Date Collected: 8/27/2019
Time Collected: 7:21 am
Result: 392 cfu/100 mL

Date Collected: 9/4/2019
Time Collected: 12:52 pm
Result: 2100 cfu/100 mL

The elevated fecal result of 2100 cfu/100 mL is due to the time of day in which the sample was taken. The first two samples were taken early in the morning before the site facilities were fully utilized. The last sample was taken mid-day and after lunch when usage was optimal. The results above were taken before the effluent is discharged to the pond.

The site's sanitary waste stream is piped to a large onsite manmade excavation/pond with no outlet (Gordon's Lake). This non-water of the U.S. is the receiving water.

The Bryan Mound Facility does not chlorinate their STP system and this provides a healthy eco-system for the pond. We are afraid that adding chlorine to the discharge will disrupt the aquatic life that is present in the site's pond.

**LABORATORY TEST RESULTS**

Job ID : 19081394

Date 8/23/2019

Client Name: Fluor Federal Petroleum
Project Name: 4500049856 / Fluor FPO

Attn: Shari Gartman

Client Sample ID: 002 / 19297
Date Collected: 08/21/19
Time Collected: 07:15
Other Information:

Job Sample ID: 19081394.01
Sample Matrix Water

Test Method	Parameter/Test Description	Result	Units	DF	Rpt Limit	Reg Limit	Q	Date Time	Analyst
SM 9222D	Fecal Coliform								
	Coliform, Fecal	260	cfu/100mL	4	4			08/21/19 14:15	JYS

**LABORATORY TEST RESULTS**

Job ID : 19081826

Date 8/28/2019

Client Name: Fluor Federal Petroleum
Project Name: 4500049856 / Fluor FPO

Attn: Shari Gartman

Client Sample ID: 19299 / 002

Job Sample ID: 19081826.01

Date Collected: 08/27/19

Sample Matrix Water

Time Collected: 07:21

Other Information:

Test Method	Parameter/Test Description	Result	Units	DF	Rpt Limit	Reg Limit	Q	Date Time	Analyst
SM 9222D	Fecal Coliform								
	Coliform, Fecal	392	cfu/100mL	4	4			08/27/19 14:05	JYS

**LABORATORY TEST RESULTS**

Job ID : 19090158

Date 9/5/2019

Client Name: Fluor Federal Petroleum
Project Name: 4500049806 / Fluor FPO

Attn: Shari Gartman

Client Sample ID: 19305/002
Date Collected: 09/04/19
Time Collected: 12:52
Other Information:

Job Sample ID: 19090158.01
Sample Matrix Water

Test Method	Parameter/Test Description	Result	Units	DF	Rpt Limit	Reg Limit	Q	Date Time	Analyst
SM 9222D	Fecal Coliform								
	Coliform, Fecal	2100	cfu/100mL	20	20			09/04/19 16:00	JYS